

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

**MOTION TO SEAL EXHIBIT B TO RESPONSE OF  
CATAHOULA PARISH SCHOOL BOARD TO SMITH LETTER**

COMES NOW, the Catahoula Parish School Board (the “Board”), who respectfully moves for an order from this Court to file Exhibit B to the Board’s response to Ms. Jill Lossin Smith’s letter under seal and, in support thereof, would show as follows:

Exhibit B contains E.S.'s individualized healthcare plan that contains sensitive medical information. In order to protect E.S.'s privacy, the Board respectfully requests that Exhibit B be filed under seal. This Motion is supported by the contemporaneously filed Memorandum.

**WHEREFORE, PREMISES CONSIDERED**, the Catahoula Parish School Board moves for the entry of the proposed Order submitted contemporaneously herewith to allow Exhibit B to the Board's Response to be filed under seal.

**Respectfully submitted**, this the 9<sup>th</sup> day of October 2019.

## CATAHOULA PARISH SCHOOL BOARD

**HAMMONDS, SILLS, ADKINS & GUICE, LLP**  
2431 S. Acadian Thruway, Suite 600  
Baton Rouge, Louisiana 70808  
Telephone: (225) 923-3462  
Facsimile: (225) 923-0315

*s/ John Richard Blanchard*  
**ROBERT L. HAMMONDS**  
Bar Roll No. 6484  
**PAMELA WESCOVICH DILL**  
Bar Roll No. 31703  
**JOHN RICHARD BLANCHARD**  
Bar Roll No. 37036

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the above and foregoing MOTION was filed electronically with the Clerk of Court by use of the CM/ECF system, which will send a notice of electronic filing to counsel registered with the Court for receipt of pleadings by e-mail.

I do hereby further certify that, on the date stated below, a true and correct copy of the above foregoing MOTION and accompanying Exhibits, in print format, was forwarded via U.S. mail to Ms. Jill Lossin Smith at the following address which was listed on her letter to the Court:

Jill Lossin Smith  
21835 Hwy 124  
Jonesville, Louisiana 71343

**BATON ROUGE, LOUISIANA**, this the 9<sup>th</sup> day of October 2019.

*s/ John Richard Blanchard*  
**JOHN RICHARD BLANCHARD**  
Bar Roll No. 37036